



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8200

November 10, 2011

VIA FACSIMILE

Honorable Tonianne J. Bongiovanni
United States Magistrate Judge
Clarkson S. Fisher Building & Courthouse
402 East State Street, Room 2020
Trenton, New Jersey 08608

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Re: *SPD Swiss Precision Diagnostics GmbH v. Church & Dwight Co., Inc.*, Case No. 09-01802 (FLW)(TJB) and Related Case *P-0276*

Dear Judge Bongiovanni:

We represent Church & Dwight Co., Inc. in the above-referenced litigation. We write on behalf of both parties to request certain modifications of the current discovery schedule.

The parties have been working diligently to complete fact discovery, including conducting depositions overseas. However, as a consequence of certain discovery disputes and scheduling conflicts, the parties believe that a modest extension of the current cut-off dates is necessary in order to complete pretrial discovery and also give Your Honor sufficient time to resolve the discovery disputes that are currently before the Court and any additional disputes that may be submitted to the Court for resolution.

Accordingly, the parties propose the following adjustments to the current schedule:

- Fact discovery cut-off: The parties propose that it be extended to December 23, 2011 (from October 31, 2011). The parties have agreed, however, that no further written discovery (e.g., new document requests and interrogatories) will be propounded.
- Deadline for service of initial expert reports: The parties propose that it be extended to January 13, 2012 (from November 30, 2011).
- Deadline for service of rebuttal expert reports: The parties propose that it be extended to March 1, 2012 (from January 13, 2012).
- Expert discovery cut-off: The parties propose that it be extended to April 2, 2012 (from February 16, 2012).
- Dispositive motion deadline: The parties propose that it be extended to May 14, 2012 (from March 19, 2012).

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For the foregoing reasons, the parties respectfully request that Your Honor approve the modified discovery schedule as proposed above. The parties thank the Court for its consideration of this joint request.

Respectfully submitted,



Michael T. Mervis

cc: Jeffrey G. Knowles

*A telephone conference to be initiated
by Plaintiff shall be held on
January 5, 2012 at 10 AM*

So Ordered this 10 day
of November, 20 11
